

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

NATHAN ROBERTS and FREEDOM
TRUCK DISPATCH LLC, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

PROGRESSIVE PREFERRED INSURANCE
COMPANY; PROGRESSIVE CASUALTY
INSURANCE COMPANY; CIRCULAR
BOARD LLC,

Defendants.

Civil Action No. 1:23-cv-01597

JUDGE PATRICIA A. GAUGHAN
Magistrate Judge James E. Grimes, Jr.

**MOTION FOR THE ADMISSION,
PRO HAC VICE, OF ANDREA
ALAJBEGOVIC AS COUNSEL FOR
*AMICI CURIAE***

Pursuant to Local Civil Rule 83.5(h), I hereby move for the admission, *pro hac vice*, of Andrea Alajbegovic, an attorney at the Southern Poverty Law Center located at 111 East Capitol St., Suite 280, Jackson, MS, 39201, and a member in good standing of the Mississippi and New York state bars (MS Bar No. 106442; NY Bar No. 5765615), as counsel in this case for *Amici Curiae* The Southern Poverty Law Center, the National Hispanic Bar Association, and Asian Americans Advancing Justice. The declaration of Andrea Alajbegovic is filed herewith.

Date: December 21, 2023

Respectfully submitted,

s/ Andrea Alajbegovic

Andrea Alajbegovic (MS Bar No. 106442)
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CERTIFICATE OF SERVICE

I certify that, on December 21, 2023, I electronically transmitted the attached MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF ANDREA ALAJBEGOVIC AS COUNSEL FOR *AMICI CURIAE*, its accompanying declaration, Certificate of Good Standing, and proposed order using the CM/ECF system. Notice of Electronic Filing will be sent to all CM/ECF registrants for this matter.

Signed: s/ Andrea Alajbegovic

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